

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THOMAS TURNER, an individual, on behalf
of himself and others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL RETIREMENT
BENEFIT PLAN; LIBERTY MUTUAL
MEDICAL PLAN; LIBERTY MUTUAL
RETIREMENT BENEFIT PLAN
RETIREMENT BOARD; LIBERTY
MUTUAL GROUP INC., a Massachusetts
company; LIBERTY MUTUAL
INSURANCE COMPANY, a Massachusetts
company; and, DOES 1 through 50, inclusive,

Defendants.

Civil Action No. 1:20-cv-11530

**DECLARATION OF SHAMIS BECKLEY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

I, Shamis Beckley, declare as follows:

1. I am an attorney in good standing in the Commonwealth of Massachusetts, Board of Bar Overseers No. 697425, and a partner at the law firm of McDermott Will & Emery LLP, attorneys herein for Defendants Liberty Mutual Retirement Benefit Plan, Liberty Mutual Medical Plan, Liberty Mutual Retirement Benefit Plan Retirement Board, Liberty Mutual Group Inc., and Liberty Mutual Insurance Company (together, "Liberty Mutual"). I submit this Declaration in support of Defendants' Motion to Dismiss. I have prepared this declaration upon my personal knowledge and review of available documentation.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a Liberty Mutual Health Plan Summary Plan Description (for U.S. Employees Only), eff. Jan. 1, 2019.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Liberty Mutual Retiree Medical Plan, Liberty Mutual Group Inc.

I declare under penalty of perjury under the laws of the State of Massachusetts that the foregoing is true and correct.

Executed this 9th day of November 2020.

/s/ Shamis N. Beckley

Shamis N. Beckley (BBO # 697425)

CERTIFICATE OF SERVICE

I certify that this document, filed through the Court's ECF system, will be sent electronically to the registered participants in this matter as identified on the Notice of Electronic Filing.

Date: November 9, 2020

/s/ Shamis N. Beckley
Shamis N. Beckley (BBO # 697425)